

#04-7984

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Date: 7/13/04 12:01AM
Subject: Comments on Proposed Revisions FR Doc 04-7984

Comments on Notice Of Proposed Revisions to Mandatory Guidelines-FR Doc 04-7984

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Section 3.

At least two certified labs must be available for each drug, metabolite or adulterant tested, for when split testing is requested.

The cutoff for 6-AM should be as low as possible ---even to 1.0ng/ml for urine testing.

A 6-AM level of 2 or 3 should be positive.

Labs should routinely run D&L isomer tests for positive methamphetamine results, just like 6-AM is run on morphine positives.

The lower cutoffs for cocaine and the amphetamines is supported, so long as these still could not represent "passive exposure".

Section 4. and Section 8. -Collection process

Will there be some established curriculum for training trainers and collectors? A review every 3 years (like MRO recertification) is also needed to keep current as new information, test methods, and technologies are brought into use by employers.

How will a collector know if sufficient hair is collected? Will each have or be required to have a scale?

When collecting a hair sample, head hair should not be the only option.

Whether or not an oral fluid donor admits having had anything in their mouth, a uniform 5 or 10 minute wait should occur.

If a donor cannot provide 45ml of urine, a maximum of 40 (not 24) ounces of fluid should be offered over a 3 hour time period. A time limit needs to be set.

Section 6.

A uniform CCF should be created that can be used for any type specimen collected.

Section 11.

All non-negative results should be reported to the MRO with a quantation level.

Section 12.

Very close controls or review are needed to prevent the possibility of ignoring positive tests. I don't see this adequately addressed.

Thank you.